



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
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ALAMEDA POINT  
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VIA FACSIMILE  
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January 18, 2001

Mr. Rick Weissenborn  
EFD Southwest BRAC Offices  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

Re: U.S. EPA Review of Draft Final Operable Unit 3 Remedial Investigation Report Addendum,  
Volume 1, Alameda Naval Air Station

Dear Mr. Weissenborn:

The U.S. Environmental Protection Agency (U.S. EPA) has received and review, "Operable Unit 03 Remedial Investigation Addendum Volume 1 Alameda Point [former Alameda Naval Air Station], Alameda, California Draft Final" (RI Addendum), dated December 13, 2000. As noted in the Navy's cover letter, the RI Addendum will now be completed in three (3) separate volumes. Previous data on radiological human health risk assessment, radiological closure report and cumulative risk will now be presented in Volume II and Volume III will present the geotechnical characterization, unexploded ordnance (UXO) screening, and any additional UXO removal.

Based upon our review of the RI Addendum (which included a Navy response to U.S. EPA's August 3, 2000 comments on the draft version), U.S. EPA still has a limited number of concerns and comments. One example of U.S. EPA's concern is in regards to the landfill methane gas survey. Despite our request for clarification, the subject report still states that the landfill gas survey was inconclusive, because analytical results from the soil-gas samples analyzed by the mobile laboratory did not compare well with the analytical results from the soil-gas samples analyzed by the fixed laboratory. As a result, the RI Addendum concludes that an additional landfill gas investigation is necessary before designing a final containment remedy for the site. The Navy indicates that different sampling protocol may be necessary but fails to identify any methods. U.S. EPA believe that it is imperative that prior to undertaking additional characterization the BRAC Cleanup Team (BCT) agree on the method to be used for collecting, handling, and analyzing samples. For additional U.S. EPA comments on the RI Addendum and the Navy response to U.S. EPA comments, please see the enclosure.

If you have any questions concerning this matter, please do not hesitate to contact me at (415) 744-2365.

Sincerely,



Phillip Ramsey  
Remedial Project Manager

Enclosure

cc: Mr. Michael McClelland, BRAC Environmental Coordinator  
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**U.S. EPA Review of Draft Final Operable Unit 3  
Remedial Investigation Addendum, Volume 1,  
Alameda Naval Air Station, Alameda, California**

**U.S. EPA COMMENTS**

The Navy responded to the three (3) general comments. The Navy's responses to U.S. EPA's August 3, 2000, General Comments 1 and 2 are acceptable.

**General Comments:**

3. The Navy's response to this comment is conditionally acceptable. In its response, the Navy list five (5) conditions whereby COPCs were screened out. One of these conditions is that the COPC is, "considered to be essential nutrients". Though generally this is an acceptable condition, the Navy should keep in mind that at elevated levels of some nutrients may become toxic. In addition, the Navy, in its cover letter dated December 12, 2000, states that cumulative risk will be addressed in Volume II. U.S. EPA reserves the right to re-evaluate this response based on a review of Volume II.

In addition, it is inappropriate to screen out COPCs based on a less than 5% detection rate. RAGS Part A presents an example where COPCs were screened out based on a less than 5% detection rate, however this is not policy or guidance. COPCs that the Navy wishes to screen out based on frequency of detection should be analyzed carefully to assure that i) the detections are not indicative of hot spots which pose a threat in of themselves, and ii) the detections are not grouped spatially indicating a release. For example, if there are 300 analyses for compound X with a PRG of 10, it would be inappropriate to screen compound X out if there were 4 detections at concentrations of 1000 or if there were 9 detections at 50 all grouped around a potential release area. Please reassess all COPCs that were eliminated based on low frequencies of detection and assure that none that pose potential threats to human health or the environment were inadvertently screened out.

**Specific Comments:**

U.S. EPA submitted twenty four (24) specific comments on the *Alameda Point Draft Remedial Investigation/Feasibility Study Addendum* to the Navy. Six (6) of the comments (16, 17, 19, 20, 21, and 22) dealt with risk assessment issues. The Navy indicated these comments will be addressed in Volume II of the OU-3 Report Addendum which is forthcoming. Ten (10) comments (2, 3, 6, 7, 8, 9, 12, 14, 15, and 18) were adequately addressed by the Navy in its *Response to Comments on the Alameda Point Draft Remedial Investigation/Feasibility Study Addendum, Alameda Point, Alameda,*

California, preface to the *Draft Operable Unit 3 Remedial Investigation Addendum, Volume I* report and within the report itself.

1. The Navy indicates that it believes that any documents for which it does not receive comments have been approved by the regulators. The Navy should not assume implied approval of any documents submitted to U.S. EPA based strictly on the non-receipt of comments to a document.
4. The Navy's response to this comment is conditionally acceptable. If cyanide later is found to be a COPC, then the Navy should include all data on wells with cyanide detections before completing the FS. For example, at the West Beach Landfill, cyanide is detected in monitoring wells MW-22A and MW-23A, which are adjacent wells located between the Bay and the landfill. It would be inappropriate to screen out cyanide as a COPC at the West Beach Landfill.
5. The response indicates that the requested data was added to the Table. However, the requested addition of "soil gas data" to Table 1-1, Data Gap Number 2, Groundwater Extent of Contamination, was not added. Please make the requested addition.
10. The Navy has deferred responding to this comment to the Revised Draft Feasibility Study, which is conditionally acceptable. U.S. EPA reserves the right to re-evaluate this response based on a review of the Revised Draft Feasibility Study (FS) Report.
11. The Navy has deferred responding to this comment until after the installation of a long-term monitoring system at the landfill, which is conditionally acceptable. U.S. EPA reserves the right to re-evaluate this response based on review of the long-term landfill gas monitoring results.
13. While Figure 1-3 has been modified to show the soil gas sampling locations, the figure does not indicate where the different type of soil gas samples (ie., flux chamber summa canisters/fixed lab, syringe/mobile lab, and summa canister/fixed lab) were collected. Figure 2-6 does identify the flux chamber locations, however, as previously requested, a single figure should identify where and what type of sample(s) were collected at each location.
24. The Navy's response to this comment is not acceptable. No details or procedures for the field or fixed laboratory sample handling procedures were included in the revised report. In addition, though the report indicates that the FSP protocol was followed, there is no statement as to whether there were any deviations from the protocol at any time. Please revise the report to include sample handling procedures and whether the FSP protocol was deviated from, and if so, an explanation of the deviation(s).

Additional Specific Comments:

1. Section 2.1.1, Page 2-2: The third paragraph on this page discusses the detection of naphthalene and phenanthrene at Sampling Location HP-S01-B3. Acenaphthene was also indicated at this location at 160 micrograms per liter (ug/L). This concentration is only 10 ug/l below the Ecological Reference Value (ERV) of 170 ug/L. It would appear that based upon the precision and accuracy of the laboratory reporting that this compound is close enough to the ERV that it should be included in the discussion of shoreline sampling. Please include a discussion of the chronic marine Ambient Water Quality Criteria (AWQC) for acenaphthene.

In addition, in the fourth paragraph, the discussion on the development of the ERV for naphthalene is confusing. The report indicates that the ERV of 620 ug/L was developed by applying a dilution factor of 10 to the chronic freshwater AWQC of 620 ug/L. The report indicates that this is then the “no observed adverse effects level (NOAEL) concentration. It is unclear whether this is also the ERV concentration. Also the remainder of the paragraph and the discussion of screening criterion in the second bullet is confusing. Please revise these paragraphs or add an additional section to clearly explain the methodology the Navy used to determine the ERV, NOAEL, and Lowest Observed Adverse Effects Level (LOAEL) and which number was then used by the Navy to determine the significance of a contaminant.

2. Section 2.2, page 2-5: The second paragraph on this page states that the landfill gas characterization was performed by C.E. Schmidt as a subcontractor. However, Appendix C indicates that Interphase Environmental, Inc. performed the landfill gas survey. Appendix D indicates that C.E. Schmidt performed the surface flux measurements. Please clearly indicate who performed the various services for the landfill gas characterization.
3. Section 2.2.2.1, Page 2-7: The third paragraph in this section indicates the possibility that methane, “collects in pockets”. However, in the first paragraph of Section 2.2.2.2, Volatile Organic Compounds, the report the report states that the results of VOC detection indicate, “widespread mixing of waste”. It would be logical to assume that if methane collected in pockets, that the VOC gasses, since the VOCs are spread out over the landfill, would also tend to collect in the same pockets. Please explain why the VOC gasses would not collect in the same pockets as the methane gasses.
4. Figure 1-1, Installation Restoration Site Location Map: Please revise the figure to show all IR sites, including new IR Site 29 (“Skeet Range”), offshore to OU3. Also, IR Site 2 (OU4A) boundary needs to be expanded to include the WestBeach Wetlands and coastal margins.